

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No.: 4:16-cr- 502 CEJ (PLC)
)
DEBORAH PIERCE,)
)
Defendant.)

**FOURTH UNOPPOSED MOTION TO EXTEND THE TIME TO FILE PRETRIAL
MOTIONS AND TO CONTINUE THE EVIDENTIARY HEARING**

COMES NOW Defendant, Deborah Pierce, by and through counsel, and hereby moves this Court to extend the time to file pretrial motions by a period of thirty (30) days and continue the evidentiary hearing to a date to be selected by this Court. In support of this motion, Defendant states as follows:

1. Defendant is charged with a single violation of Title 18 U.S.C. § 1341. See Redacted Indictment [Doc. Text #2].
2. Defendant has requested additional discovery from the government, in particular, financial and accounting records from Webster University related to its operation of the Confucius Institute and the funds the University received and expended in connection therewith.
3. The government expects to disclose these records no sooner than two to three weeks from today's date.
4. Once received, Defendant and counsel will require additional time to review the records and assess their impact on the pretrial motions available.

5. For these reasons, the instant motion is necessary to provide counsel for the “defendant...the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.” 18 U.S.C. § 3161(h)(7)(B)(iv). Accordingly, “the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

6. Defendant, through counsel, has discussed this matter with assistant United States attorney Thomas Albus. Mr. Albus does not object to Defendant’s request.

WHEREFORE, Defendant respectfully requests this Honorable Court extend the time to file pretrial motions by a period of thirty (30) days and to continue the evidentiary hearing to a date to be selected by this Court.

Respectfully submitted,

ROSENBLUM FRY, P.C.,

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CERTIFICATE OF SERVICE

I hereby certify that on March 23, 2017, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon Mr. Thomas C. Albus, assistant United States attorney.

